



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

May 29, 2025

Via ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *SEC v Medallion Fin. Corp., et al.*, No. 21-cv-11125 (S.D.N.Y.)

Dear Judge Kaplan:

Plaintiff Securities and Exchange Commission (“SEC”) respectfully submits this letter seeking approval of the proposed final consent judgments (ECF Nos. 124, 125) as to Defendants Medallion Financial Corp. (“Medallion Financial”), Andrew Murstein (“Murstein”), Lawrence Meyers (“Meyers”) and Ichabod’s Cranium (“Ichabod’s”). If approved, the proposed consent judgments would resolve all of the SEC’s claims against all Defendants in this case. The proposed consent judgments would:

- Enjoin Meyers and Ichabod’s from committing future violations of Section 17(b) of the Securities Act of 1933 (“Securities Act”) and Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”), and Rule 10b-5 thereunder;
- Enjoin Medallion Financial from committing future violations of Securities Act Sections 17(a)(1), 17(a)(3) and 17(b); Exchange Act Section 10(b) and Rule 10b-5 thereunder; and Exchange Act Sections 13(a), 13(b)(2)(A) and (B) and Rules 12b-20, 13a-1, 13a-11 and 13a-13 thereunder;
- Enjoin Murstein from committing future violations of Securities Act Sections 17(a)(1) and (3), and 17(b); Exchange Act Section 10(b) and Rules 10b-5 and 13b2-2 thereunder, and from aiding and abetting future violations of Exchange Act Sections 13(a), 13(b)(2)(A), and 13(b)(2)(B) and Rules 12b-20, 13a-1, 13a-11, and 13a-13 thereunder;
- Require Meyers to pay a civil penalty of \$100,000;
- Require Medallion Financial to pay a civil penalty of \$3 million;

Hon. Lewis A. Kaplan
May 29, 2025

Page 2

- Require Murstein to pay a civil penalty of \$1 million; and
- Require Medallion Financial comply with certain undertakings as set forth in the proposed judgment.

The proposed judgments are fair, reasonable, and, with respect to the injunctive relief, do not disserve the public interest under the standards set forth in *SEC v. Citigroup Global Markets, Inc.*, 752 F.3d 285, 294 (2d Cir. 2014) (setting out standard for reviewing proposed consent judgments in government enforcement actions). Accordingly, the SEC respectfully requests that the Court approve the proposed judgments and docket them with the signed consents.

Respectfully submitted,

/s/ David Stoelting

David Stoelting
Senior Trial Counsel
stoeltingd@sec.gov
(212) 336-0174

cc: All counsel of record (by ECF)